

Timothy W. Hoover
Partner
Direct Dial: 716.848.1271
Direct Facsimile: 716.961.9964
thoover@hodgsonruss.com

July 21, 2017

Via CM-ECF

Honorable Valerie E. Caproni
United States District Judge
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Joseph Percoco, et al.*, No. 16-CR-776 (VEC) (S.D.N.Y.)

Dear Judge Caproni:

We are counsel for Defendant Louis Ciminelli. We respectfully move the Court to extend the date (set by the Court's Order at Docket #280) by which the unredacted copy of the Letter of Daniel C. Oliverio, dated July 7, 2017, must be filed under seal, from July 21, 2017 to July 25, 2017. Earlier today, we hand delivered a copy of the letter with the requisite sealing envelope to the Sealed Records Department, and were given additional guidance and instruction before the letter would be accepted for filing, including that the original letter needed to be submitted. We are taking steps to re-submit the original, and will be able to do so on or before Tuesday July 25, 2017. Per Docket #280, we filed the July 7, 2017 in redacted form today via CM-ECF (*see* Docket #282).

Please contact me if you have any questions.

Respectfully yours,

/s/Timothy W. Hoover

Timothy W. Hoover

TWH/dcb

cc: All counsel of record (*via CM-ECF*)